



Oregon OSHA COVID-19 Workplace Advisory Memo (11.12)

“Model Policy for Notification of Employees when COVID-19 Exposure Occurs”

Subsection 3(j) of the recently adopted Oregon OSHA Temporary COVID-19 rule includes a provision requiring almost all employers to develop a COVID-19 infection notification process. The process must provide for the notification of exposed employees – those who were within 6 feet of a confirmed COVID-19 individual for a cumulative total of 15 minutes or more – and of affected employees – those who work in the same facility or in the same well-defined portion of the facility (such as on the same floor or in the same building within larger complex).

This policy and procedure need not be extensive. Implementation of a simple, straightforward policy such as the following model would satisfy the requirements of the rule:

COVID-19 Notifications by Employer

All employees and managers are expected to notify the employer in the event that they test positive for COVID-19 or they become aware that another individual who has been present in the worksite (employee, customer, contractor, guest, etc.) has been confirmed as having COVID-19. When such a notification occurs or the employer becomes aware that a person with confirmed COVID-19 has been in the workplace by any other means, the following measures will be taken:

- C0 Based on a reasonable assessment of the activity of the individual with confirmed COVID-19, the employer will seek to identify each employee who was likely to have been within 6 feet of the infected individual for a cumulative total of 15 minutes or more. Those employees will be notified individually of the exposure (by telephone, text message, or e-mail) and will be advised that they should seek guidance from their individual physician or from local public health officials about testing options. The individual who was the source of the exposure will not be identified.
D0 In addition, the following notification will be sent to everyone working in the facility where the exposure occurred, even if they did not appear to have close contact with the individual in question: "We have been notified an individual who has been present at [location] has been diagnosed with COVID-19. We are notifying those individuals who appear to have had close contact with the individual, but we want to alert everyone to the possibility of exposure. If you experience symptoms of COVID-19 illness, please inform the employer and contact your health care provider. The employer will protect all employee medical information and will disclose it only to the degree such disclosure is strictly necessary. For more information on COVID-19, including symptoms of which you may want to be aware, please visit the Oregon Health Authority COVID-19 website or the US Centers for Disease Control & Prevention COVID-19 website. If you have any questions or concerns, please contact the Oregon Department of Consumer & Business Services at 1-800-333-3333.